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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TRISHA WREN and CYNTHIA PIPER, et
al., individually and on behalf of others
similarly situated,

Plaintiffs,

vs.

RGIS Inventory Specialists, LLC, RGIS, LLC,
and Does 1-25 Inclusive,

Defendants.

Case No. 3:06-cv-05778 JCS

STIPULATION AND ~~proposed~~ ORDER
REGARDING DISCOVERY ISSUES

STIPULATION

On June 10, 2008, the parties met and conferred at the Northern District Court regarding several discovery issues in the above-reference matter. This Stipulation memorializes the results of that meet and confer session, as follows:

A. Agreements

1. Defendant previously produced header information for the electronic database files produced pursuant to this Court's April 2, 2008 Order, in which some errors were later discovered. By close of business on June 12, 2008, Defendant will amend and supplement the prior production of header information to provide accurate and complete headers for all data tables produced pursuant to the Court's April 2, 2008 Order.

2. By close of business on June 12, 2008, Defendant shall produce the original names for all files produced pursuant to the Court's April 2, 2008 Order. "Original names" means the names of the files as they are stored in Defendant's Oracle database.

3. By close of business on June 13, 2008, Defendant shall identify how to find the pre-2007 time sheet detail information within the database that has been produced to Plaintiffs and Dr. Drogin.

4. By close of business on June 13, 2008, Defendant shall produce a sample of electronic copies of the Daily Edits Audit Reports ("Edits Logs") in native format (text) for each of California, Illinois, Oregon, and Washington.

5. By close of business on June 13, 2008, Defendant shall identify how to find the fields and files containing the categories of information in the time sheet detail reports (a sample of which is attached as Exhibit A) within the data that has been produced to Plaintiffs and Dr. Drogin.

6. Defendant shall preserve all existing and subsequently created Edits Logs from March 12, 2008 forward (the stipulation date minus the 90 days for which Defendant has been preserving such data on the Unix-based server).

B. Matters to be Discussed And Revisited

1. Defendant's counsel shall confer with Defendant promptly regarding whether

Defendant will voluntarily produce all Edits Logs in native (text) format for California, Illinois, Oregon, and Washington.

2. Defendant's counsel shall confer with Defendant promptly regarding whether Defendant will voluntarily produce the database file "tables.doc" which contains descriptions of the data tables and fields and some definitions of same, subject to the terms of the Stipulated Protective Order executed by the parties in this matter and, if so, the timetable for doing same.

3. Defendant's counsel shall confer with Defendant promptly regarding whether Defendant will agree to make available its database experts for telephone questioning as needed by Dr. Richard Drogin with counsel present.

4. Defendant will provide its responses to Plaintiffs' counsel on the foregoing issues by no later than close of business on June 16, 2008.

C. To Be Further Briefed to the Court

The parties will submit letter briefs of two pages for each side regarding the following disputes:

1. Whether Defendant must produce in native Oracle format time record and payroll data already produced to Plaintiffs in comma-delimited format pursuant to the Court's April 2, 2008 Order; and,

2. Whether defendant must produce the data contained within "SCHEDULED_START_DATE_TIME" in native Oracle format, as identified in the Deposition of Yvette Valdez, pp. 171-72.

3. The parties have stipulated to a one-week extension on the schedule on Rule 23 class certification, and will provide a proposed stipulation and order to the Court re same.

SO STIPULATED, THROUGH COUNSEL OF RECORD:

Dated: June 16, 2008

DRINKER, BIDDLE & REATH LLP

/s/ Cheryl D. Orr

Cheryl D. Orr

Attorneys for Defendant RGIS LLC

1 Dated: June 16, 2008

SCHNEIDER WALLACE
COTTRELL BRAYTON KONECKY LLP

3 /s/Guy B Wallace
4 Guy B. Wallace
Attorneys for Plaintiffs

5 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

7 Dated: zJune 16, 2008

